

Exhibit 1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE: CATHODE RAY TUBE (CRT)) MASTER FILE NO.
ANTITRUST LITIGATION) CV-07-5944 JST
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)
)
THIS DOCUMENT RELATES TO:)
)
)
ALL INDIRECT PURCHASER ACTIONS)
ALL DIRECT PURCHASER ACTIONS)
)
)
DEFENDANTS.)
)

VIDEOTAPED DEPOSITION OF LI MIAO
VOLUME II
WEDNESDAY, MARCH 8, 2023
HONG KONG

FILE NO. SF 5759553

REPORTED BY MARK McCLURE, CRR
CAL CSR 12203

1 VIDEOTAPED DEPOSITION OF LI MIAO, VOLUME II, TAKEN AT
2 7:58 A.M., WEDNESDAY, MARCH 8, 2023, HONG KONG, VIA
3 VERITEXT REMOTE TECHNOLOGY, BEFORE MARK McCLURE, C.S.R.
4 #12203, CERTIFIED SHORTHAND REPORTER IN AND FOR THE
5 STATE OF CALIFORNIA.

6
7 APPEARANCES OF COUNSEL:

8 FOR THE PLAINTIFF, ALL INDIRECT PURCHASER:

9 (APPEARING BY VIDEOCONFERENCE)

10 TRUMP, ALIOTO, TRUMP & PRESCOTT

11 BY: LAUREN CAPURRO, ESQ.

12 120 HOLSTROM CIRCLE

13 NOVATO, CALIFORNIA 94947-2072

14 415.860.5051

15 LAURENRUSSELL@TATP.COM

16 (APPEARING BY VIDEOCONFERENCE)

17 BRAMSON, PLUTZIK, MAHLER & BIRKHAEUSER

18 BY: DANIEL BIRKHAEUSER, ESQ.

19 2125 OAK GROVE ROAD, SUITE 125

20 WALNUT CREEK, CALIFORNIA 94598-2534

21 925.945.0200

22 DBIRKHAEUSER@BRAMSONPLUTZIK.COM

23 FOR THE PLAINTIFF ALL DIRECT PURCHASER:

24 (APPEARING BY VIDEOCONFERENCE)

25 SAVERI & SAVERI

BY: DAVID HWU, ESQ.

706 SANSOME STREET

SAN FRANCISCO, CALIFORNIA 94111

415.217.6810

DHWU@SAVERI.COM

(APPEARING BY VIDEOCONFERENCE)

SAVERI & SAVERI

BY: MATTHEW HEAPHY, ESQ.

706 SANSOME STREET

SAN FRANCISCO, CALIFORNIA 94111

415.217.6810

MHEAPHY@SAVERI.COM

1 APPEARANCES OF COUNSEL: CONTINUING
2 (APPEARING BY VIDEOCONFERENCE)
3 SAVERI & SAVERI
4 BY: GEOFFREY C. RUSHING, ESQ.
5 706 SANSOME STREET
6 SAN FRANCISCO, CALIFORNIA 94111
7 415.217.6810
8 GRUSHING@SAVERI.COM

9
10 FOR THE DEFENDANT, IRICO, AND THE WITNESS, LI MIAO :

11 (APPEARING BY VIDEOCONFERENCE)
12 BAKER BOTTS, LLP
13 BY: EVAN WERBEL, ESQ.
14 700 K STREET NW
15 WASHINGTON, DC 20001
16 202.639.1323
17 EVAN.WERBEL@BAKERBOTTS.COM

18 (APPEARING BY VIDEOCONFERENCE)
19 BAKER BOTTS, LLP
20 BY: THOMAS E. CARTER, ESQ.
21 700 K STREET NW
22 WASHINGTON, DC 20001
23 202.639.1323
24 THOMAS.CARTER@BAKERBOTTS.COM

25 (APPEARING BY VIDEOCONFERENCE)
26 NORTON ROSE FULBRIGHT US, LLP
27 BY: KAYLEE YANG, ESQ.
28 555 CALIFORNIA STREET, SUITE 3300
29 SAN FRANCISCO, CALIFORNIA 94104
30 628.231.6827
31 KAYLEE.YANG@NORTONROSEFULBRIGHT.COM

32
33 ALSO PRESENT:

34 WENKAI ZHANG, IN-HOUSE COUNSEL, IRICO GROUP
35
36 AMANDA LIN, CHINESE INTERPRETER
37
38 RAMON PERAZA, VIDEOGRAPHER

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1 would be displayed. It would be shown. 18:59:58

2 Q. The 14-inch CPT that was manufactured at this 19:00:01

3 time, June of 2005, was that round or flat? How would 19:00:06

4 you describe that CPT? 19:00:15

5 MR. CARTER: Object to form. 19:00:19

6 THE WITNESS: The 14-inch has always been FS. 19:00:35

7 BY MR. RUSHING: 19:00:35

8 Q. FS? Is that what you said? 19:00:41

9 A. Yes, it's always been FS for the 14-inch. 19:00:48

10 Q. And what does "FS" mean? 19:00:53

11 A. FS refers to -- I'm not sure if you used to 19:00:56

12 have a CRT TV set at home. On the surface, it still has 19:01:19

13 some curvage. 19:01:26

14 Q. And then "PF" stands for pure flat, is that 19:01:36

15 correct? 19:01:44

16 A. Correct. 19:01:44

17 Q. And am I correct to understand that PF CPTs 19:01:51

18 have no curvature? 19:01:59

19 A. For common users, consumers, the surface that 19:02:01

20 you can see, that's visible to you at home, does not 19:02:23

21 have curvature. 19:02:27

22 Q. And am I correct to understand that the 19:02:42

23 smallest CPT, the 14-inch CPT, would have the lowest 19:02:45

24 cost to manufacture of all of the CPTs manufactured by 19:03:00

25 Irico? 19:03:11

1 A. Your understanding is correct, if we 19:03:12
2 understand it or look at it from the absolute value 19:03:40
3 perspective. 19:03:45

4 Q. And what perspective would it be potentially 19:03:50
5 incorrect? 19:03:56

6 A. Let me think how I can explain this to you. 19:03:56

7 There's a cost-performance ratio. 19:04:18

8 For example, if I buy a foot of fabric versus 19:05:10
9 buying a meter of fabric, the price for a foot of fabric 19:05:16
10 might be lower than the price of a meter of the fabric. 19:05:21

11 So the average value, the average price for the foot of 19:05:26
12 fabric might be lower. 19:05:33

13 So if we are talking about this from the 19:05:35
14 perspective of a unit, your understanding might not be 19:05:38
15 wrong, but it also may not be correct. 19:05:45

16 Q. Okay, thank you. 19:05:50

17 But the total cost to manufacture a 14-inch 19:05:58
18 tube, on average, would be lower than the total cost to 19:06:01
19 manufacture a larger tube? 19:06:07

20 A. I said earlier that, in general, you can 19:06:24
21 understand it that way. 19:06:35

22 Q. Okay. And in general, is the cost to 19:06:36
23 manufacture a pure flat screen greater than the cost to 19:06:42
24 manufacture a standard flat screen of the same size? 19:06:54

25 A. In general, you can say it that way. 19:06:59

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VIDEOTAPED DEPOSITION OF LI MIAO
VOLUME III
THURSDAY, MARCH 9, 2023
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FILE NO. SF 5759557

REPORTED BY MARK McCLURE, CRR
CAL CSR 12203

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2 7:56 A.M., THURSDAY, MARCH 9, 2023, HONG KONG, VIA
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19 2125 OAK GROVE ROAD, SUITE 125

20 WALNUT CREEK, CALIFORNIA 94598-2534

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22 DBIRKHAEUSER@BRAMSONPLUTZIK.COM

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25 BY: DAVID HWU, ESQ.

706 SANSOME STREET

SAN FRANCISCO, CALIFORNIA 94111

415.217.6810

DHWU@SAVERI.COM

(APPEARING BY VIDEOCONFERENCE)

SAVERI & SAVERI

BY: MATTHEW HEAPHY, ESQ.

706 SANSOME STREET

SAN FRANCISCO, CALIFORNIA 94111

415.217.6810

MHEAPHY@SAVERI.COM

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3 SAVERI & SAVERI
4 BY: GEOFFREY C. RUSHING, ESQ.
5 706 SAN SOME STREET
6 SAN FRANCISCO, CALIFORNIA 94111
7 415.217.6810
8 GRUSHING@SAVERI.COM

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14 700 K STREET NW
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16 202.639.1323
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1 are under the oath to tell the truth. 16:22:11

2 A. Yes. 16:22:36

3 Q. So you mentioned that the specification of the 16:22:37

4 deflection yoke is contained in the model number, is 16:22:46

5 that right? 16:22:49

6 A. Yes. 16:22:50

7 O. What other attributes of the finished product 16:23:02

16:23:07
8 are reflected in the model number?

9 A. I did not understand the meaning of the 16:23:27

10 question. 16:23:29

11 O. Well, from what you just told me, the model 16:23:30

number is -- contains information about the tube. is 16:23:33

13 that right? 16:23:42

14 A. Yes. 16:23:50

Q What type of information can be learned from 16:23:51

the model number of a tube that Irico produces? 16:34:05

17. Information regarding the dimension, the size 16:24:25

18 safety information and also another piece of 16:24:33

information which I'm not sure how to describe. 16:34:53

It is the information about whether it is a 16, 24, 36, 48, 60, 72, 84, 96, 108, 120, 132, 144, 156, 168, 180, 192, 204, 216, 228, 240, 252, 264, 276, 288, 300, 312, 324, 336, 348, 360, 372, 384, 396, 408, 420, 432, 444, 456, 468, 480, 492, 504, 516, 528, 540, 552, 564, 576, 588, 600, 612, 624, 636, 648, 660, 672, 684, 696, 708, 720, 732, 744, 756, 768, 780, 792, 804, 816, 828, 840, 852, 864, 876, 888, 890, 900, 912, 924, 936, 948, 960, 972, 984, 996, 1008, 1020, 1032, 1044, 1056, 1068, 1080, 1092, 1104, 1116, 1128, 1140, 1152, 1164, 1176, 1188, 1190, 1200, 1212, 1224, 1236, 1248, 1260, 1272, 1284, 1296, 1308, 1320, 1332, 1344, 1356, 1368, 1380, 1392, 1404, 1416, 1428, 1440, 1452, 1464, 1476, 1488, 1490, 1500, 1512, 1524, 1536, 1548, 1560, 1572, 1584, 1596, 1608, 1620, 1632, 1644, 1656, 1668, 1680, 1692, 1704, 1716, 1728, 1740, 1752, 1764, 1776, 1788, 1790, 1800, 1812, 1824, 1836, 1848, 1860, 1872, 1884, 1896, 1908, 1920, 1932, 1944, 1956, 1968, 1980, 1992, 2004, 2016, 2028, 2040, 2052, 2064, 2076, 2088, 2090, 2100, 2112, 2124, 2136, 2148, 2160, 2172, 2184, 2196, 2208, 2220, 2232, 2244, 2256, 2268, 2280, 2292, 2304, 2316, 2328, 2340, 2352, 2364, 2376, 2388, 2390, 2400, 2412, 2424, 2436, 2448, 2460, 2472, 2484, 2496, 2508, 2520, 2532, 2544, 2556, 2568, 2580, 2592, 2604, 2616, 2628, 2640, 2652, 2664, 2676, 2688, 2690, 2700, 2712, 2724, 2736, 2748, 2760, 2772, 2784, 2796, 2808, 2820, 2832, 2844, 2856, 2868, 2880, 2892, 2904, 2916, 2928, 2940, 2952, 2964, 2976, 2988, 2990, 3000, 3012, 3024, 3036, 3048, 3060, 3072, 3084, 3096, 3108, 3120, 3132, 3144, 3156, 3168, 3180, 3192, 3204, 3216, 3228, 3240, 3252, 3264, 3276, 3288, 3290, 3300, 3312, 3324, 3336, 3348, 3360, 3372, 3384, 3396, 3408, 3420, 3432, 3444, 3456, 3468, 3480, 3492, 3504, 3516, 3528, 3540, 3552, 3564, 3576, 3588, 3590, 3600, 3612, 3624, 3636, 3648, 3660, 3672, 3684, 3696, 3708, 3720, 3732, 3744, 3756, 3768, 3780, 3792, 3804, 3816, 3828, 3840, 3852, 3864, 3876, 3888, 3890, 3900, 3912, 3924, 3936, 3948, 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5880, 5892, 5904, 5916, 5928, 5940, 5952, 5964, 5976, 5988, 5990, 6000, 6012, 6024, 6036, 6048, 6060, 6072, 6084, 6096, 6108, 6120, 6132, 6144, 6156, 6168, 6180, 6192, 6204, 6216, 6228, 6240, 6252, 6264, 6276, 6288, 6290, 6300, 6312, 6324, 6336, 6348, 6360, 6372, 6384, 6396, 6408, 6420, 6432, 6444, 6456, 6468, 6480, 6492, 6504, 6516, 6528, 6540, 6552, 6564, 6576, 6588, 6590, 6600, 6612, 6624, 6636, 6648, 6660, 6672, 6684, 6696, 6708, 6720, 6732, 6744, 6756, 6768, 6780, 6792, 6804, 6816, 6828, 6840, 6852, 6864, 6876, 6888, 6890, 6900, 6912, 6924, 6936, 6948, 6960, 6972, 6984, 6996, 7008, 7020, 7032, 7044, 7056, 7068, 7080, 7092, 7104, 7116, 7128, 7140, 7152, 7164, 7176, 7188, 7190, 7200, 7212, 7224, 7236, 7248, 7260, 7272, 7284, 7296, 7308, 7320, 7332, 7344, 7356, 7368, 7380, 7392, 7404, 7416, 7428, 7440, 7452, 7464, 7476, 7488, 7490, 7500, 7512, 7524, 7536, 7548, 7560, 7572, 7584, 7596, 7608, 7620, 7632, 7644, 7656, 7668, 7680, 7692, 7704, 7716, 7728, 7740, 7752, 7764, 7776, 7788, 7790, 7800, 7812, 7824, 7836, 7848, 7860, 7872, 7884, 7896, 7908, 7920, 7932, 7944, 7956, 7968, 7980, 7992, 8004, 8016, 8028, 8040, 8052, 8064, 8076, 8088, 8090, 8100, 8112, 8124, 8136, 8148, 8160, 8172, 8184, 8196, 8208, 8220, 8232, 8244, 8256, 8268, 8280, 8292, 8304, 8316, 8328, 8340, 8352, 8364, 8376, 8388, 8390, 8400, 8412, 8424, 8436, 8448, 8460, 8472, 8484, 8496, 8508, 8520, 8532, 8544, 8556, 8568, 8580, 8592, 8604, 8616, 8628, 8640, 8652, 8664, 8676, 8688, 8690, 8700, 8712, 8724, 8736, 8748, 8760, 8772, 8784, 8796, 8808, 8820, 8832, 8844, 8856, 8868, 8880, 8892, 8904, 8916, 8928, 8940, 8952, 8964, 8976, 8988, 8990, 9000, 9012, 9024, 9036, 9048, 9060, 9072, 9084, 9096, 9108, 9120, 9132, 9144, 9156, 9168, 9180, 9192, 9204, 9216, 9228, 9240, 9252, 9264, 9276, 9288, 9290, 9300, 9312, 9324, 9336, 9348, 9360, 9372, 9384, 9396, 9408, 9420, 9432, 9444, 9456, 9468, 9480, 9492, 9504, 9516, 9528, 9540, 9552, 9564, 9576, 9588, 9590, 9600, 9612, 9624, 9636, 9648, 9660, 9672, 9684, 9696, 9708, 9720, 9732, 9744, 9756, 9768, 9780, 9792, 9804, 9816, 9828, 9840, 9852, 9864, 9876, 9888, 9890, 9900, 9912, 9924, 9936, 9948, 9960, 9972, 9984, 9996, 10008, 10020, 10032, 10044, 10056, 10068, 10080, 10092, 10104, 10116, 10128, 10140, 10152, 10164, 10176, 10188, 10190, 10200, 10212, 10224, 10236, 10248, 10260, 10272, 10284, 10296, 10308, 10320, 10332, 10344, 10356, 10368, 10380, 10392, 10404, 10416, 10428, 10440, 10452, 10464, 10476, 10488, 10490, 10500, 10512, 10524, 10536, 10548, 10560, 10572, 10584, 10596, 10608, 10620, 10632, 10644, 10656, 10668, 10680, 10692, 10704, 10716, 10728, 10740, 10752, 10764, 10776, 10788, 10790, 10800, 10812, 10824, 10836, 10848, 10860, 10872, 10884, 10896, 10908, 10920, 10932, 10944, 10956, 10968, 10980, 10992, 11004, 11016, 11028, 11040, 11052, 11064, 11076, 11088, 11090, 11100, 11112, 11124, 11136, 11148, 11160, 11172, 11184, 11196, 11208, 11220, 11232, 11244, 11256, 11268, 11280, 11292, 11304, 11316, 11328, 11340, 11352, 11364, 11376, 11388, 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13044, 13056, 13068, 13080, 13092, 13104, 13116, 13128, 13140, 13152, 13164, 13176, 13188, 13190, 13200, 13212, 13224, 13236, 13248, 13260, 13272, 13284, 13296, 13308, 13320, 13332, 13344, 13356, 13368, 13380, 13392, 13404, 13416, 13428, 13440, 13452, 13464, 13476, 13488, 13490, 13500, 13512, 13524, 13536, 13548, 13560, 13572, 13584, 13596, 13608, 13620, 13632, 13644, 13656, 13668, 13680, 13692, 13704, 13716, 13728, 13740, 13752, 13764, 13776, 13788, 13790, 13800, 13812, 13824, 13836, 13848, 13860, 13872, 13884, 13896, 13908, 13920, 13932, 13944, 13956, 13968, 13980, 13992, 14004, 14016, 14028, 14040, 14052, 14064, 14076, 14088, 14090, 14100, 14112, 14124, 14136, 14148, 14160, 14172, 14184, 14196, 14208, 14220, 14232, 14244, 14256, 14268, 14280, 14292, 14304, 14316, 14328, 14340, 14352, 14364, 14376, 14388, 14390, 14400, 14412, 14424, 14436, 14448, 14460, 14472, 14484, 14496, 14508, 14520, 14532, 14544, 14556, 14568, 14580, 14592, 14604, 14616, 14628, 14640, 14652, 14664, 14676, 14688, 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²¹ See also the discussion of the 500,000, 600,000, 110,000, and 16,000 cases in the text.

22. *in 5 minutes* (15-16-17) *in 10 minutes* (15-16-17) *in 15 minutes* (15-16-17)

28 | Page | 100% Selective | Selective Segregation | 100% Segregation | 15, 25, 30

1 information. 16:25:44

2 Q. Okay. You mentioned something called a shadow 16:25:44

3 mask earlier. 16:25:47

4 Is information about the shadow mask contained 16:25:50

5 in the model number? 16:25:54

6 A. Only in special circumstances. In most 16:25:55

7 circumstances, it will not be contained in the model 16:26:13

8 number. 16:26:16

9 Q. When would you include information about the 16:26:17

10 shadow mask in the model number? 16:26:20

11 A. In the last two days, a lot of exhibits were 16:26:22

12 shown by the attorney to me, and only the one that has 16:26:52

13 AK in the model number would include the shadow mask 16:26:58

14 information. All the others would not include the 16:27:01

15 shadow mask information in the model numbers. 16:27:04

16 Q. Do you remember, after thinking about it now, 16:27:10

17 what the "AK" stands for? 16:27:12

18 A. I don't understand your question. 16:27:14

19 What did you mean? 16:27:29

20 Q. Does "AK" -- is that an acronym for a word? 16:27:31

21 A. Yesterday, when I was asked about this, I gave 16:27:37

22 a positive answer. Yes, AK is the abbreviation of a 16:27:55

23 phrase. 16:28:01

24 MR. BIRKHAEUSER: Of what? 16:28:02

25 I didn't hear that, Miss Translator. 16:28:04

1 conversion to the CPT 54-centimeter PF? 20:17:34

2 MR. BIRKHAEUSER: Objection. Leading. 20:17:41

3 THE WITNESS: It says the G line was converted 20:18:13

4 into the production line for the 20-inch pure flat, but 20:18:17

5 it doesn't indicate that the time for the conversion was 20:18:23

6 in 2001. 20:18:26

7 It's possible that the conversion took place 20:18:45

8 in 2002 or 2001 -- or 2003. A bigger possibility is 20:18:47

9 that the conversion took place in 2002. 20:18:54

10 BY MR. WERBEL: 20:19:01

11 Q. Thank you, Mr. Li. 20:19:01

12 Moving to some of your earlier testimony also 20:19:02

13 today that I wanted to ask you about. 20:19:07

14 Mr. Birkhaeuser asked you about the different 20:19:13

15 information that was available in the model number 20:19:19

16 itself. 20:19:23

17 Do you remember that line of questioning? 20:19:24

18 A. He asked some questions earlier today 20:19:26

19 regarding model numbers, yes. 20:19:53

20 Q. I believe you stated that one factor that the 20:19:57

21 model number would reveal is whether the product itself 20:20:00

22 is a standard, an ultra flat or a pure flat. 20:20:05

23 Do you remember saying that? 20:20:12

24 MR. BIRKHAEUSER: Object to form. 20:20:14

25 THE WITNESS: There was such a question and 20:20:37

1 answer. 20:20:39

2 BY MR. WERBEL: 20:20:39

3 Q. So when you referred to a product as a 20:20:40

4 standard, what does that mean? 20:20:48

5 A. For a standard product, the model number would 20:20:57

6 not include any special marking. For example, if it's 20:21:16

7 14-inch, it would just say "14-inch." It doesn't say 20:21:21

8 any extra suffix in the model number. 20:21:25

9 21-inch FS refers to the 21-inch ultimate 20:21:40

10 flat. 21-inch pure flat would be the 21-inch PF. 20:21:47

11 That's how the names of these three product 20:22:03

12 types differ. 20:22:07

13 Q. And is a regular flat the same as a standard 20:22:09

14 flat? 20:22:13

15 A. I don't know about the English phrase you just 20:22:28

16 used. 20:22:31

17 MR. WERBEL: Madam translator, was there a 20:22:36

18 difference in Chinese between the standard flat and the 20:22:39

19 regular flat? 20:22:42

20 THE INTERPRETER: Yes. 20:22:43

21 MR. WERBEL: So which does he refer to it as 20:22:48

22 the standard? 20:22:50

23 MR. BIRKHAEUSER: Is there a question pending? 20:22:53

24 MS. YANG: Amanda, can I say something about 20:23:08

25 the translation between these two words, the standard 20:23:10